

**BEFORE THE  
FEDERAL MARITIME COMMISSION**

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**DOCKET NO. 15-11**

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**IGOR OVCHINNIKOV, IRINA RZAEVA, and DENIS NEKIPELOV,**

— vs. —

**MICHAEL HITRINOV a/k/a  
MICHAEL KHITRINOV,  
EMPIRE UNITED LINES CO., INC., and CARCONT, LTD.**

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**INFORMAL DOCKET NO.: 1953(I)**

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**KAIRAT NURGAZINOV,**

— vs. —

**MICHAEL HITRINOV a/k/a  
MICHAEL KHITRINOV,  
EMPIRE UNITED LINES CO., INC., and CARCONT, LTD.**

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**COMPLAINANTS' STATUS REPORT**

Complainants herein submit this Status Report in response to respondents' Status Report of this date, and to make the Presiding Officer aware of the following:

In the first instance, it is noted that Complainants have had a growing concern over Mr. Jeffrey's personal mental state, and competency to continue representation of his client in this matter. That concern has only been heightened by Mr. Jeffrey's recent submission, which can only be described as completely irrational. Accordingly, complainants respectfully suggest that the Presiding Officer schedule a formal competency hearing in order to determine whether Mr. Jeffrey should be taken off this case by his firm.

It is further noted that Mr. Jeffrey's so-called "Status Report" was submitted unsolicited by the Presiding Officer, as is Mr. Jeffrey's practice, which includes continuing violation of the Rules of Practice and Procedure of the Commission with impunity. Further, and is plainly evident

from its content, said submission is not a “Status Report” at all, but rather yet another unbalanced attempt to distract and prejudice the Presiding Officer against complainants herein.

While it hardly seems necessary to respond to the alleged “substance” of Mr. Jeffrey’s recent submission, suffice it to say that in construing a light-hearted attempt to advise Mr. Jeffrey that complainants were and are aware of his continuing violations of the rules and endless frivolous submissions by a rhetorical device consisting of an admitted reference to a pop song, as a “threat”, Mr. Jeffrey has now ‘stepped over the line’ and into the abyss.

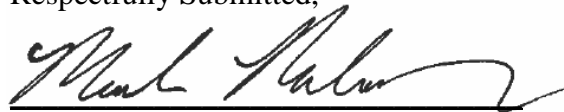
Complainants can only hope that Mr. Jeffrey’s reference to contacting “The Police” is a sardonic reference to the artists involved, as opposed to a serious representation of contacting any law enforcement authority in response to the email appended to his Status Report.

In closing, we respectfully request that the Presiding Officer forthwith issue a directive that from this point forward, and for the remainder of this litigation, that the parties be precluded from serving or filing any further “Status Reports” (legitimate or otherwise) unless specifically requested by the Presiding Officer.

We sincerely regret having to burden the Presiding Officer with correspondence on an issue equivalent to that which might arise in a schoolyard sandbox, but were compelled to do so due to Mr. Jeffrey’s infantile, irrational, and unbalanced reaction to same.

Dated: September 2, 2016  
Brooklyn, New York

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Marcus A. Nussbaum', with a stylized flourish at the end.

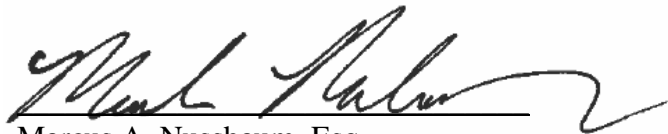
Marcus A. Nussbaum, Esq.  
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Attorney for Complainants  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the **COMPLAINANTS' STATUS REPORT** upon Respondents' Counsel at the following address:

Nixon Peabody LLP  
Attn: Eric C. Jeffrey, Esq.  
799 9th Street NW, Suite 500  
Washington, DC 20001-4501

by first class mail, postage prepaid, and by email (ejeffrey@nixonpeabody.com).

A handwritten signature in black ink, appearing to read "Marcus A. Nussbaum", written over a horizontal line.

Marcus A. Nussbaum, Esq.  
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Attorney for Complainants  
marcus.nussbaum@gmail.com

Dated: September 2, 2016 in Brooklyn, New York.